

**From:** Rob Hartman <Rob.J.Hartman@mwhglobal.com>  
**Sent:** Tuesday, February 18, 2014 3:19 PM  
**To:** Rochlin, Kevin  
**Cc:** Sheldrake, Beth; Greutert, Ed [USA]; Barbara Ritchie; Kelly Wright; susanh@ida.net; Bruce.Olenick@deq.idaho.gov; Douglas.Tanner@deq.idaho.gov; Scott.Miller@deq.idaho.gov; Jeff Hamilton; Marguerite Carpenter; David Heineck; Marc Bowman; Mike Steiner  
**Subject:** RE: FMC Plant OU RDRA Monthly Report #8 - January 2014  
**Attachments:** 2014-02-18 FMC Plant OU RDRA Order Monthly Report #8 - January 2014.pdf  
  
**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Kevin:

Please find attached the FMC OU RDRA Monthly Report #8 for January 2014 as required under Paragraph 55 of the FMC Plant OU RDRA Unilateral Administrative Order reporting on the status of implementation of the Remedial Design / Remedial Action work. This report covers the time period from January 1 to January 31, 2014.

Rob Hartman  
**MWH Americas, Inc.**  
(801) 617-3256



Via email

February 18, 2014

Kevin Rochlin  
Remedial Project Manager, Superfund Program  
US EPA, Region 10  
1200 Sixth Avenue  
Seattle, WA 98101

**RE: MONTHLY REPORT NO. 8 – JANUARY 2014**  
FMC Operable Unit of the Eastern Michaud Flats Superfund Site  
Unilateral Administrative Order for Remedial Design and Remedial Action  
Docket No. CERCLA-10-2013-0116

Dear Mr. Rochlin,

This is the monthly report concerning the FMC Plant OU (the site) submitted pursuant to Paragraph 55 of the subject Unilateral Administrative Order for Remedial Design and Remedial Action (UAO), effective June 20, 2013. This report describes the time period between January 1, 2014 and January 31, 2014.

**a) ACTIONS TAKEN DURING THE TIME PERIOD:**

- Submitted deliverables (listed in item c below) and began preparation of deliverables (listed in item d below) as required based on the effective date of the subject UAO.

**b) SUMMARY OF SAMPLING RESULTS AND DATA RECEIVED DURING THE TIME PERIOD**

- Received last results from geotechnical testing laboratories for the samples collected pursuant to the *Data Gap Work Plan*. The results/data and an evaluation of those data were presented in the *Data Gap Investigation Report* that was submitted on January 28, 2014 (see item c below).

**c) PLANS, REPORTS AND OTHER DELIVERABLES SUBMITTED DURING THE TIME PERIOD**

- On January 10, 2014, submitted the *Extraction Zone Hydrogeologic Study Work Plan* (EZHWP) which incorporated the revisions specified in FMC's October 31, 2013 responses to EPA, IDEQ and SBT comments on the EZHWP. This EZHWP also included additional revisions in response to an EPA letter transmitted to FMC via email on December 6, 2013.
- Received EPA approval on the *Extraction Zone Hydrogeologic Study Work Plan* (EZHWP) on February 6, 2014.

- On January 28, 2014, submitted the *Data Gap Investigation Report* presenting the results from geotechnical testing and data gap investigations performed pursuant to the *Data Gap Work Plan*.
- Received EPA comments on the *Gamma Cap Performance Evaluation Report* on January 29, 2014.

**d) ACTIONS SCHEDULED FOR THE NEXT TWO MONTHS**

- Prepare and submit *Soil Remedy - 30% Design Package* by March 3, 2014. Note that the *Site-Wide Grading and Stormwater Design and Plans* which are part of this package will be submitted at the Pre-final (90%) RD level.
- Prepare and submit response to Agency comments received on January 29, 2014 on the *Gamma Cap Performance Evaluation Report*. Pursuant to EPA's comments and recommendations, FMC via an email on February 12, 2014 requested a conference call to discuss the comments and recommendation for additional study. EPA scheduled a conference call for March 6, 2014 at 9 PST / 10 MST / 12 EST.
- Targeting mobilization for implementation of EZHWP field work in mid-March 2014 per EPA approval of the work plan on February 6, 2014. A firm schedule for mobilization to the field, based on field conditions, long-range weather forecasts, and subcontractor and equipment availability will be communicated to EPA when finalized.

**e) UNRESOLVED DELAYS ENCOUNTERED OR ANTICIPATED THAT MAY AFFECT THE SCHEDULE FOR IMPLEMENTATION OF WORK AND EFFORTS TO MITIGATE**

- There are currently no unresolved delays encountered or anticipated, actual and anticipated modifications to the schedule are described in item f below.

**f) MODIFICATIONS TO WORK PLANS OR SCHEDULES PROPOSED**

- a. Attached are the updated RD/RA Preliminary Schedules for soil and groundwater remedies (Revision 4.2 to Tables 6-1 and 6-2 of the RDWP). Revision 4.2 includes minor updates to reflect actual dates for submittal of the *Data Gap Investigation Report* on January 28, 2014, receipt of EPA comments on the *Gamma Cap Performance Evaluation Report* on January 29, 2014, EPA approval of the *Extraction Zone Hydrogeologic Study Work Plan* (EZHWP) on February 6, 2014 and receipt of EPA comments on the *Gamma Cap Performance Evaluation Report* on January 29, 2014.
- b. As described in the November and December 2013 UAO monthly reports, FMC has begun preparation of the site-wide grading and storm water management design and will be accelerating preparation and submittal of the Preliminary (30%) Design for the soil remedy. With timely EPA review and approval of these design submittals, site grading should commence during the 2014 construction season. Site-wide grading that creates an integrated stormwater management system is a required

precursor to cap construction and is otherwise independent of and does not prejudice the final cap designs (i.e., gamma and ET caps). Schedule for these deliverables:

RD Deliverable / Work Element	Date
Submit Soil Remedy - 30% Design Package; Site-Wide Grading and Stormwater Design and Plans will be submitted at the Pre-final (90%) RD level	March 3, 2014
EPA Comments on 30% RD Package and Site-Wide Grading and Stormwater Design and Plans at the Pre-final (90%) RD level	May 2, 2014
Submit Final (100%) RD Package for Site-Wide Grading and Stormwater Design and Plans	June 2, 2014
EPA approval for Site-Wide Grading and Stormwater Design and Plans	June 30, 2014
Pre-Construction Inspection and Meeting	July 7, 2014
Start of Site-Wide Grading Construction	July 9, 2014

If you have any questions concerning the monthly report, please feel free to call Marc Bowman at (801) 617-3234, Rob Hartman at (801) 617-3256, or Barbara Ritchie at (215) 299-6700.

Sincerely,



Marc Bowman  
Project Director  
MWH Americas, Inc.



Rob Hartman  
RD Manager  
MWH Americas, Inc.

cc: (as required under the UAO and as directed by EPA)

Bruce Olenick, IDEQ  
Doug Tanner, IDEQ  
Scott Miller, IDEQ  
Kelly Wright, Shoshone-Bannock Tribes  
Susan Hansen, Shoshone-Bannock Tribes

# Soil Remedial Design / Remedial Action Preliminary Schedule (Rev 4.2)

RD Deliverable/Work Element	Schedule per UAO	Baseline <sup>1</sup> Planned	Revised Plan	Actual
<b>Remedial Design Work Plan</b>				
Submit Remedial Design Work Plan (RDWP)	W/in 45 days EPA approval SC			8/12/2013
EPA Comments on RDWP	NS	9/13/2013		10/28 and 12/12/2013
Submit Final RDWP	14 days or as specified by EPA	9/27/2013		12/19/2013
EPA Approval RDWP	NS	10/14/2013		12/19/2013
<b>Performance Testing (PT) Work Plans - Soil Remedy</b>				
RD Data Gap (DG) Acquisition Work Plan	W/in 60 days EPA approval SC			7/15/2013
Gamma Cap (GC) Performance Evaluation Work Plan	W/in 60 days EPA approval SC			7/15/2013
EPA approval of GC WP	NS	8/16/2013		9/5/2013
EPA approval of DG WP	NS	8/16/2013		10/22/2013
<b>Execute PTs to Support Soil Remedial Design</b>				
PT Field Work	Per DG/GC Work Plans	8/26 to 9/27/2013		9/11 to 11/13/2013
Submit GC / DG PT Reports	Per DG/GC Work Plans	10/25/2013		11/25/2013 / 1/28/14
EPA Comments on GC / DG PT Reports	NS	11/22/2013	1/3/28/2014	1/29/14 /
Submit Final GC / DG PT Reports	14 days or as specified by EPA	11/29/2013	4/15 <sup>3</sup> / 4/11/2014	
EPA approval GC / DG PT Reports	NS	12/16/2014	2/17 / 4/30/2014	
<b>Remedial Design - Soil Remedy</b>				
Submit Soil Remedy - 30% Design Package	45 days after EPA approval of GC/DG PT reports	1/27/2014	3/3/2014	
EPA Comments on 30% RD Package	NS	3/6/2014	5/2/2014	
Submit Soil Remedy Pre-Final (90/95%) RD Package	120 days after receipt of EPA comments on 30% RD	5/1/2014	TBD	
EPA Comments on Pre-Final RD Package	NS	5/29/2014	TBD	
Submit Soil Remedy Final RD Package	21 days after receipt of EPA comments on Pre-final RD	6/26/2014	TBD	
<b>Remedial Action Work Plan - Soil Remedy</b>				
Submit Draft RAWP Soil Remedy	Concurrent with Pre-Final RD	5/1/2014	TBD	
EPA Comments on RAWP Soil Remedy	NS	5/29/2014	TBD	
Submit Final RAWP Soil Remedy	Concurrent with Final RD	6/26/2014	TBD	
<b>Remedial Contractor Procurement</b>				
Bid Package Preparation - Soil Remedy	NS	5/5/2014	TBD	
Evaluate Bids / Recommendation	NS	6/26/2014	TBD	
<b>EPA Approval Soil Remedy Final RD and RAWP</b>				
	NS	7/7/2014	TBD	
<b>Soil Remedial Action</b>				
Award RA Contract	45 days after EPA approval RAWP	7/10/2014	TBD	
Pre-Construction Inspection and Meeting	30 days after Award RA Contract	7/17/2014	TBD	
Start of Soil Remedy Construction	15 days after Pre-Con Meeting	7/28/2014	TBD	
<b>Institutional Control Program</b>				
Institutional Control Implementation and Assurance Plan	Submit with 30% RD for Soil RA	1/27/2014	3/3/2014	
EPA Comments on ICIAP	NS	4/28/2014	TBD	
Submit Final ICIAP	14 days or as specified by EPA	5/12/2014	TBD	
EPA Approval ICIAP	NS	6/11/2014	TBD	
Implement ICIAP	Per ICIAP			

1 Baseline schedule is the Planned schedule from Table 6-1 of the draft RDWP, August 2013.

2 As described in item f of the November and December 2013 UAO monthly report, FMC intends to accelerate submittal of the 30% soil design to a March 3, 2014 submittal and, assuming a review of 60 days, would have EPA comments on May 2, 2014.

3 Per EPA 1/29/14 comments and recommendations on the Gamma Cap Performance Evaluation Report, 4/15/14 is the target date for FMC's response to EPA comments on the GCPE Report and submittal of a plan for additional study.

NS means no schedule (timeframe) specified in UAO.

**Groundwater Remedial Design / Remedial Action Preliminary Schedule (Rev 4.2)**

RD Deliverable/Work Element	Schedule per UAO	Baseline <sup>1</sup> Planned	Revised Plan	Actual
<b>Remedial Design Work Plan</b>				
Submit Remedial Design Work Plan	W/in 45 days EPA approval SC			8/12/2013
EPA Comments on RDWP	NS	9/13/2013		10/28 and 12/12/2013
Submit Final RDWP	14 days or as specified by EPA	9/27/2013		12/19/2013
EPA Approval RDWP	NS	10/14/2013		12/19/2013
<b>Performance Testing (PT) Work Plans - Groundwater Remedy</b>				
Groundwater Extraction Zone Hydrogeologic (EZH) Work Plan	W/in 60 days EPA approval SC			7/15/2013
EPA Comments on GW EZH Work Plan	NS	8/16/2013		9/16 and 12/6/2013
Submit Final Groundwater EZH Work Plan	14 days or as specified by EPA	Not included		1/10/2014
EPA approval of Groundwater EZH Work Plan	NS	8/16/2013		2/6/2014
<b>Execute PTs to support Groundwater (GW) Remedial Design</b>				
PT Field Work	Per GW EZH Work Plan	8/26 to 11/8/2013	3/15 to 5/22/2014	
Submit GW EZH Report	Per GW EZH Work Plan	1/10/2014	7/24/2014	
EPA Comments on GW EZH Report	NS	2/7/2014	9/24/2014	
Submit Final GW EZH Report	14 days or as specified by EPA	2/14/2014	10/1/2014	
EPA approval GW EZH Report	NS	2/28/2014	10/29/2014	
<b>Remedial Design - Groundwater Remedy</b>				
Submit Groundwater Remedy - 30% Design Package	45 days after EPA approval of GW EZH Report	3/24/2014	12/12/2014	
EPA Comments on 30% RD Package	NS	4/21/2014	2/12/2015	
Submit Groundwater Remedy - 60% Design Package	90 days after EPA comments on 30% RD	7/21/2014	4/9/2015	
EPA Comments on 60% RD Package	NS	8/22/2014	6/10/2015	
Submit Pre-Final (90/95%) Groundwater RD Package	90 days after receipt of EPA comments on 60% RD	10/24/2014	8/5/2015	
EPA Comments on Pre-Final RD Package	NS	11/24/2014	10/6/2015	
Submit Groundwater Remedy Final RD Package	21 days after receipt of EPA comments on Pre-final RD	12/15/2014	11/3/2015	
<b>Remedial Action Work Plan - Groundwater Remedy</b>				
Submit Draft RAWP Groundwater Remedy	Concurrent with Pre-Final RD	10/24/2014	8/5/2015	
EPA Comments on RAWP	NS	11/24/2014	10/6/2015	
Submit Groundwater Remedy Final RAWP	Concurrent with Final RD	12/15/2014	11/3/2015	
<b>Remedial Contractor Procurement</b>				
Bid Package Preparation Groundwater Remedy	NS	10/30/2014	11/10/2015	
Evaluate Bids / Recommendation	NS	12/19/2014	12/15/2015	
<b>EPA Approval Groundwater Remedy Final RD and RAWP</b>	<b>NS</b>	<b>1/15/2015</b>	<b>12/3/2015</b>	
<b>Groundwater Remedial Action</b>				
Award RA Contract - Groundwater	45 days after EPA approval RAWP	3/1/2015	1/19/2016	
Pre-Construction Inspection and Meeting	30 days after Award RA Contract	3/31/2015	2/17/2016	
Start of Construction	15 days after Pre-Con Meeting	4/14/2015	3/2/2016	

<sup>1</sup> Baseline schedule is the Planned schedule from Table 6-2 of the draft RDWP, August 2013.

NS means no schedule (timeframe) specified in UAO.